

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

TQ DELTA, LLC,

*Plaintiff,*

v.

COMMSCOPE HOLDING COMPANY,  
INC., COMMSCOPE, INC., ARRIS US  
HOLDINGS, INC., ARRIS SOLUTIONS,  
INC., ARRIS TECHNOLOGY, INC., and  
ARRIS ENTERPRISES, LLC,

*Defendants.*

Civil Action No.: 2:21-cv-310

**DECLARATION OF JAMES D. SHEAD IN SUPPORT OF DEFENDANTS' OPPOSED  
MOTION TO TRANSFER VENUE TO THE DISTRICT OF DELAWARE**

I, James D. Shead, declare and state as follows:

1. I am Lead Counsel – Litigation at CommScope Technologies, LLC. I have knowledge of the facts set forth herein, and if called to do so, could competently testify to them.

I submit this declaration in support of Defendants' Opposed Motion to Transfer Venue to the District of Delaware.

2. CommScope is a global provider of infrastructure solutions for both wired and wireless broadband networks. CommScope has approximately 33,900 employees worldwide.

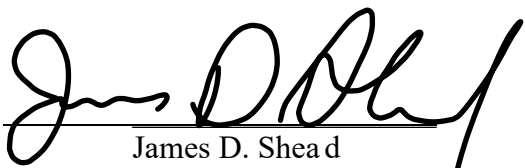
3. CommScope has a facility in Richardson, Texas. As of the beginning of November 2021, 272 employees and 6 independent contractors were assigned to that facility. None of the employees or independent contractors at the Richardson facility are involved in the design or development of DSL products, including, in particular, the accused products in this case.

4. The CommScope witnesses likely to have knowledge of the design or development of DSL products include: a Senior VP of Home Networks, a VP of Product Management, a Senior Director of Software Engineering, and a VP of R&D Engineering residing in Georgia; a VP of Finance – Home Networks residing in Pennsylvania; a Director of Software Engineering and a Principal Software Engineer residing in California; and a Senior Manager of Software Engineering residing in Austin, Texas.

5. CommScope's relevant documents and physical evidence are located with these witnesses in Georgia, Pennsylvania, California, and Austin, Texas. CommScope does not maintain any documents related to the accused products, or otherwise relevant to this case, in the Eastern District of Texas.

I declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct.

Dated: November 11 2021

By:   
James D. Shead